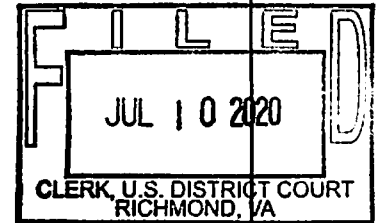


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S MOTION FOR LEAVE TO  
SEEK TRANSFER FOR FORUM NON  
CONVENIENS OR TO AMEND PLEADING

**DEFENDANT'S MOTION FOR LEAVE TO SEEK TRANSFER FOR FORUM NON  
CONVENIENS OR TO AMEND PLEADING**

Defendant Jason Goodman Pro Se respectfully submits this motion for leave to seek transfer for forum non conveniens and amend pleading. Due to the unprecedented circumstance of the Covid-19 pandemic, access to the EDVA has become extremely inconvenient for the Defendant and could require a 14-day quarantine upon return to New York. Defendant respectfully seeks to transfer this matter to the Southern District of New York.

Respectfully submitted July 9, 2020

A handwritten signature in black ink, appearing to be "JG", written over a horizontal line.

Jason Goodman, Defendant, Pro Se  
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[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

DEFENDANT'S MOTION FOR LEAVE TO SEEK TRANSFER FOR FORUM NON CONVENIENS OR TO  
AMEND PLEADING - 1